

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CV-24299 MORENO

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, JOSE MACHADO,  
AND AMINTA QUINONEZ

Defendants

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**DEFENDANTS UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO COMPLAINT**

**COME NOW** Defendants, JOSE MACHADO, AMOR DE JESUS, CORP., and AMINTA QUINONEZ, by and through undersigned counsel and files this Unopposed Motion for Extension of Time to file Response to Complaint and as grounds therefore states as follows:

1. On or about November 10, 2023, and November 11, 2023, respectively, Defendants were served with the Complaint.
2. Responses to the Complaint is due on or before December 1, 2023.
3. Undersigned counsel has just been retained by Defendants to represent them in connection with the above-referenced matter.
4. Undersigned is a sole practitioner and starts a 1-week jury trial on Monday, December 4, 2023, in the case of State of Florida vs. Mario Ortiz-Esquivarosa F19-13749 before the Honorable Judge Marlene Fernandez-Karavetsos and has been consumed in preparing for same.
5. Undersigned is requesting a fifteen (15) day extension in which to file a response to the Complaint.

6. Pursuant to Local Rules, undersigned counsel has asked opposing counsel, Brian H. Pollock, if he had any objections to our motion requesting this extension of time and he does not oppose.
7. Defendants request to file a response to the complaint on or before December 16, 2023.
8. Plaintiff will not be prejudiced by the Defendants being granted an enlargement of time.

**WHEREFORE**, Defendants requests that this Honorable Court grant this unopposed motion for extension of time and whatever other relief it deems just and reasonable.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on December 1, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/EFC. I also certify that the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

**EMMANUEL PEREZ & ASSOCIATES, P.A.**  
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By: /s/ EMMANUEL PEREZ  
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